

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Pedro Mejia Gutierrez (b)(6) 1987

Case No.

22-M- 22 - M - 613

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2021 - January 20, 2022 in the county of Outagamie, Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

*Code Section**Offense Description*21 U.S.C. Sections 841(a) and (b)
(1)(B) and 846Count One-Beginning November 2021 and January 20, 2022, conspiracy to
distribute and possess with intent to distribute a mixture and substance
containing in excess of 50 grams of methamphetamine21 U.S.C. Sections 841(a) and (b)
(1)(B)Count Two through Four-distribution of a mixture and substance containing
methamphetamine- November 22, 2021, December 20, 2021, and January
20, 2022.

This criminal complaint is based on these facts:

See Attached affidavit

☒ Continued on the attached sheet.*Complainant's signature*

DEA Special Agent James Allen

Printed name and title

Sworn to before me and signed in my presence.

Date:

1/26/2022

Judge's signature

Honorable James P. Stoker

Printed name and title

City and state:

Green Bay, Wisconsin

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST WARRANT

James Allen, being first duly sworn, states that:

Background

1. I am currently employed as a Special Agent with the Drug Enforcement Administration (DEA) Green Bay Resident Office and have been so employed since October of 2019. As a part of my current duties as a DEA agent, I investigate violations of Title 21 of the United States Code including federal controlled substances laws, firearms laws and money laundering laws (Title 21, United States Code, §§ 841(a)(1), 846, Title 18, United States Code, §§ 922, and 924 and Title 18, United States Code, §§ 1956 and 1957) and other related offenses.

Basis for Information in Affidavit

2. The information contained in this affidavit is based upon my personal knowledge and investigation, and information supplied to me by other law enforcement officers including the Sheboygan County Sheriff's officer, all of whom I believe to be truthful and reliable. Based on my investigation and the information supplied to me by other law enforcement personnel, I have probable cause to believe the following regarding Constantino PEREZ ROMANO, DOB [REDACTED] 1985 and Pedro MEJIA GUTIERREZ, DOB [REDACTED] 1987.

Facts Establishing Probable Cause

3. For the past several months, I have been investigating a drug distribution organization operating in the Green Bay Division of the Eastern District of Wisconsin as well as Sheboygan and Milwaukee, also located in the Eastern District of Wisconsin. In early November of 2021, a Sheboygan Confidential Source (CS-1) working under my control and direction called Pedro MEJIA GUTIERREZ to obtain crystal methamphetamine. MEJIA GUTIERREZ agreed and set

up a time and day to meet CS-1. CS-1 advised MEJIA GUTIERREZ that he/she is from Appleton and that he/she is looking to buy crystal methamphetamine for purposes of supplying numerous individuals in the Appleton, State and Eastern District of Wisconsin. I have worked with CS-1 on a prior investigation during which CS-1 conducted controlled buys and supplied other information to me on drug targets that I later determined to be true. CS-1 has a pending drug case and is looking for consideration on that charge. Thus, I believe CS-1 to be credible and reliable.

4. On November 22, 2021, Green Bay DEA and Milwaukee DEA directed CS-1 to conduct a controlled buy of 176 grams of crystal methamphetamine in exchange for \$2,400.00 from MEJIA GUTIERREZ M/H DOB [REDACTED] 1985. I was part of the surveillance team and observed MEJIA GUTIERREZ meet with CS-1 at a liquor store in Milwaukee where the methamphetamine transaction occurred. The controlled substance obtained from MEJIA GUTIERREZ tested positive for methamphetamine and weighed approximately 176 grams.

5. On December 20, 2021, Green Bay and Milwaukee DEA and Sheboygan County MEG, conducted another controlled buy of methamphetamine from MEJIA GUTIERREZ using CS-1. Pedro MEJIA GUTIERREZ provided approximately 146 grams of crystal methamphetamine to CS-1 in exchange for \$2,900. The transaction occurred at a gas station located in Sheboygan. During this delivery, surveillance officers and I observed MEJIA GUTIERREZ in a vehicle with a person I know to be Constantino PEREZ ROMANO. Law enforcement observed that Constantino PEREZ ROMANO was wearing the same jacket and in the same vehicle as I observed during a later drug deal described below occurring on January 20, 2022.

6. On January 20, 2022, Green Bay DEA, Milwaukee District Office (MDO), and Sheboygan County MEG, conducted another controlled buy followed by an arrest. CS-1 purchased

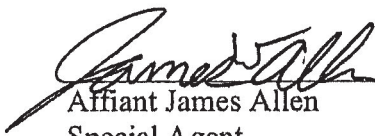
approximately 4 ounces of crystal methamphetamine from Pedro MEJIA GUTIERREZ in exchange for \$1900. Constantino PEREZ ROMANO was present during the initial meeting with CS-1. PEREZ ROMANO stated that he would obtain the crystal methamphetamine from his house and have his runner bring it back. PEREZ ROMANO and MEJIA GUTIERREZ then departed from the drug deal location and returned shortly thereafter in a different car. I believe they switched cars on the return trip to appear as if another person drove MEJIA GUTIERREZ back to the transaction location. Once back at the drug deal location, MEJIA GUTIERREZ and PEREZ ROMANO parked next to CS-1. MEJIA GUTIERREZ entered CS-1's car and delivered the methamphetamine to CS-1 in exchange for the \$1900 in recorded buy money. During the buy, MEJIA GUTIERREZ and PEREZ ROMANO spoke by telephone about the price per ounce to charge CS-1. This transaction occurred at a Milwaukee restaurant. CS-1 explained to Pedro MEJIA GUTIERREZ and Constantino PEREZ ROMANO during the buy that the methamphetamine that he/she was purchasing was to be sold in Appleton and the Oshkosh area.

7. Following the sale of four ounces of methamphetamine to CS-1, Pedro MEJIA GUTIERREZ and Constantino PEREZ ROMANO were stopped by law enforcement and were arrested. Law enforcement located an additional 4 ounces of methamphetamine in the vehicle. Constantino PEREZ ROMANO possessed \$1,900 DEA buy funds previously given to MEJIA GUTIERREZ in exchange for the methamphetamine. Pedro MEJIA GUTIERREZ was arrested with 6 grams of methamphetamine located on his person. During the controlled buy, Pedro MEJIA GUTIERREZ admitted that Constantino PEREZ ROMANO was his boss and that he worked for him on multiple occasions.

8. Based upon the foregoing information, I believe there is probable cause to believe that

Pedro MEJIA GUTIERREZ and Constantino PEREZ ROMANO conspired to deliver and possess with intent to deliver methamphetamine in an amount of 50 grams or more in violation of 21 U.S.C. 841(a)(1), and 841(b)(1)(B) and 846.

9. Because this affidavit is offered for the limited purpose of supporting the criminal complaint and arrest warrant for Pedro MEJIA GUTIERREZ and Constantino PEREZ ROMANO, I have not set forth every fact known to me regarding this incident. Rather, I have included only those facts which I believe establish probable cause.


Affiant James Allen
Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me

this 26 day of JANUARY, 2022


HONORABLE JAMES R. SICKEL
U.S. MAGISTRATE JUDGE



My commission expires: _____.